# 17.0 TRANSFER OF ACCREDITATION18

Any organization requesting to transfer accreditation bodies (still in good standing<sup>19</sup>) is required to meet the minimum requirements defined below under section 17.1. The ACLASS minimum requirements are referenced from IAF-GD6-2003 which is the only guidance found to date with regards to transfers occurring in the middle of an organization's current accreditation cycle with their current Accreditation Body. ACLASS reserves the right to modify or change these minimum requirements from time to time as other guidance is found with regards to transfer accreditations of organizations in good standing. At this time IAF-GD6-2003 is the preeminent guidance available.

## 17.1 Transfer Minimum Requirements (Referenced from IAF-GD6-2003)

Accreditation: Only organizations whose accreditations meet the ACLASS Transfer Minimum Requirements are eligible for transfer. Organizations holding accreditations that do not meet the ACLASS Transfer Minimum Requirements shall be treated as new customers

Transfer Review (as defined below) will normally occur from an organization that is still in good standing with their then current Accreditation Body. If the transfer organization meets the minimum requirements as defined under Transfer Review and an ACLASS surveillance visit has been completed, accreditation shall be granted for one year with a full reassessment occurring at the end of one year.

If the organization is seeking a transfer of accreditation and their accreditation has been suspended and/or withdrawn or is known to have been suspended and/or withdrawn, transfer will not be accepted. In such instance, the organization shall be treated as a new customer.

The granting of accreditation to an organization that seeks to transfer their accreditation to ACLASS and meets the minimum requirements as defined under Transfer Review shall be granted accreditation according to the current ACLASS decision process.

Transfer Review: ACLASS shall carry out a review of the organization applying for transfer of accreditation, still in good standing, to ensure that all elements of each applicable ACLASS conformity assessment program and the full scope of accreditation have been assessed. Transfer Review shall be conducted against all elements of the applicable standards and the full scope of accreditation by reviewing the reports of the organization's

<sup>&</sup>lt;sup>18</sup> The transfer of accreditation may occur when legal status changes in accordance with this document, the accreditation contract, and each respective ACLASS document for each respective conformity assessment program.

program.

19 The term "good standing" is defined as an organization that transfers with an active status (i.e. not suspended or under threat of suspension) during the middle of their then current accreditation cycle from their then current Accreditation Body. If the organization transfers at the end of their then current accreditation cycle, a full assessment shall be conducted against all elements of the standard.

previous Accreditation Body and a site visit to the organization.<sup>20</sup> Transfer Review will also only occur if the organization is transferring in good standing from an ILAC MRA signatory.

The Transfer Review shall cover the following:

- Confirmation that the customer's accredited activities fall within the activities of ACLASS
- That a valid (ILAC MRA signatory) accredited certificate/scope, in terms of authenticity, duration, scope of activities covered by the organization's scope of accreditation, is held in respect of the site or sites wishing to transfer accreditation.
- The state in the current accreditation cycle (If transfer occurs at the end of their current accreditation cycle, then a full assessment shall occur (i.e. treated as a new customer).
- Review of the last assessment/reassessment reports, subsequent surveillance reports
  and any outstanding nonconformance arising from the reports. A review to ensure the
  entire scope of accreditation, as well as all elements of each respective standard was
  assessed by the previous Accreditation Body.
- ACLASS surveillance visit to the site and/or sites according to the ACLASS surveillance policy.

The following shall apply for the Transfer Review:

- A potential customer that is accredited by another Accreditation Body may apply to ACLASS for transfer of its accreditation.
- The Transfer Review process will not begin until all previous reports of the
  organization's previous Accreditation Body have been reviewed and evidence
  suggests the organization previously has met the requirements for accreditation to
  each applicable conformity assessment program by their then current Accreditation
  Body.
- A potential customer shall make its request for transfer by submitting to ACLASS an appropriate application for accreditation together with the application fee then charged by ACLASS and the necessary information required as mentioned under Transfer Review.
- In conducting the Transfer Review, the Program Manager(s) or their designee shall determine whether the potential customer's current management system is effectively implemented and meets the requirements of each applicable standard and ACLASS

<sup>&</sup>lt;sup>20</sup> Applicable standard is defined as ISO/IEC 17025, ISO/IEC 17020, RMP, ISO Guide 43 (or ISO 17043 when published) or any other relevant standard for which ACLASS maintains a conformity assessment program.

requirements under this accreditation process and each applicable ACLASS conformity assessment program.

- The Program Manager(s) or their designee shall ensure that all elements of the
  applicable standard and the scope of accreditation have been assessed through review
  of the previous Accreditation Body's reports and by conducting an ACLASS
  surveillance visit (see also this document section 10.1)
- If for any reason the customer is unable to provide evidence that their management system was previously assessed against all the requirements of each applicable standard and are currently in good standing with their then current Accreditation Body, the customer shall be treated as a new customer.
- Any customer (still in good standing) requesting an extension of scope, during this
  Transfer Review, to an already approved scope of accreditation by their previous
  Accreditation Body shall be subject to on-site verification, whereas, additional
  assessment days may be necessary.

## 18.0 CUSTOMER RELOCATION (MOVE POLICY)

If a customer relocates or is in the process of relocating to a facility that is different from the location that was part of the most recent assessment, the following shall apply:

- At least 60 days prior to the move, inform ACLASS in writing of the relocation and the date of the move. ACLASS in response will forward to the organization the relocation form which will include required verification information to be submitted to ACLASS for review.
- Once the move has physically occurred, submit the required information on the
  appropriate form within 10 business days of the move. Once the above information
  has been received, the customer's accreditation is reviewed to verify satisfactory
  transition has been made. Upon satisfactory review, a new certificate and scope of
  accreditation will be issued reflecting the customer's new location.
- Should concerns remain after this review, the organization may be suspended until
  these concerns are resolved. A verification visit or unscheduled surveillance
  assessment may be required for resolution of the concerns.
- If a visit is necessary, the customer will be notified. The timeframe will be completed within 30 days from date of notification, as best as possible. Special or extenuating circumstances which affect this time frame will be considered.
- Non-conformances may be issued as a result of the visit. If non-conformances are
  issued, suspension will be continued until all issues are resolved. Once issues are
  resolved, the new certificate and scope of accreditation will be issued reflecting the
  customer's new location.

#### 19.0 MODIFICATION OF ACCREDITATION FORMS AND RECORDS

ACLASS may supplement or modify assessment forms, checklists and reports to meet additional assessment requirements. The content of the reports and records as described in this document are templates and are to be used as guidance. Appropriate changes, modifications, and/or alterations may be necessary depending upon the customer and shall be changed, modified, and/or altered, as necessary.

### 20.0 SUBCONTRACTING ASSESSMENT

ACLASS does not subcontract the assessment process.<sup>21</sup> If ACLASS decides to subcontract the assessment process ACLASS will follow the procedures outlined in this section.<sup>22</sup>

ACLASS has expended significant effort and cost in preparing to perform conformity assessment activities, including training, introductory visits, practice assessments, document reviews, planning visits, accreditation assessments, corrective action reviews, and annual scope maintenance.23

ACLASS may appoint a subcontractor to conduct conformity assessment activities on behalf of ACLASS. The Subcontractor will possess the credentials and experience to perform conformity assessment activities on behalf of ACLASS.

ACLASS shall obtain written consent from the customer if a subcontractor has been appointed.

The subcontractor shall meet the requirements of this document, Section 24, Personnel and Assessor Criteria and Training. ACLASS shall review and approve the qualifications of the subcontractor in order to determine technical competency. ACLASS shall then assign the appropriate assessment team.

A legal binding agreement shall be drafted and signed by top management, including confidentiality and conflict of interest between ACLASS and the subcontractor.

The subcontractor shall submit to ACLASS the following in order for ACLASS to track responsibly the accreditation process and to make the final accreditation decision:

The subcontractor shall submit copies of documentation during each stage of the accreditation process

APLAC, and/or IAAC MRA/MLA arrangements, whenever possible.

22 Subcontracting the assessment may occur if ACLASS does not have all of the resources to meet the needs of the customer and it is determined that subcontracting the assessment is the best available option.

<sup>&</sup>lt;sup>21</sup> If ACLASS were to subcontract the assessment, ACLASS would use an MRA signatory to the tLAC,

<sup>&</sup>lt;sup>23</sup> The conditions for subcontracting typically would occur when part of a customer's scope of accreditation falls outside of ACLASS' capabilities. In these cases, ACLASS may either subcontract the assessment as mentioned in the above footnotes or refer the customer to another MRA/MLA accreditation body with expertise in the scope of accreditation.

- The subcontractor shall submit the document review report to ACLASS immediately, once completed by the subcontractor, prior to the accreditation assessment
- The subcontractor shall submit to ACLASS all supporting technical materials, including a final report along with any additional objective evidence, obtained while performing conformity assessment activities for ACLASS, as needed

The accreditation decision, including granting, maintaining, extending, reducing, suspending, or withdrawing accreditation shall be made exclusively by ACLASS.

## 21.0 DOCUMENT CONTROL

This section establishes the procedure, approach, responsibility and authority to control the documentation that comprises all conformity assessment activities. It establishes how to prepare, change, issue, store, approve, distribute and dispose of documents.

# 21.1 Preparation

Each document shall have:

- title page,
- revision history section
- main body
- approval section
- attachments/forms (as needed)

### 21.2 Issuance and Distribution

The Vice President is responsible for the issuance and distribution of all documents and procedures.

ACLASS shall keep the approval copy of all original and changed documents in the Main File. The Main File is the master list of the latest revisions of all ACLASS documents and is in PDF electronic form. When the main file documents are printed for distribution, the approval copy shall be indicated on the title and approval pages as "APPROVAL COPY" on hardcopy documents only, when necessary. Obsolete copies of the approval copy shall be additionally indicated as "OBSOLETE" on the title and approval pages on hardcopy documents only, when necessary. Obsolete documents are maintained in an electronic file folder. Obsolete documents shall not be used, but shall be retained for history purposes, as necessary.

The distribution is defined on the distribution and approval page on the approval copy of documents in the Main File. ACLASS management information system database will contain all the current versions of documents, forms, and templates. The Vice President and/or the Senior Accreditation Manager are responsible for ensuring that the latest revision of each document is

distributed as indicated on this page. Any documents when distributed in hardcopy (i.e. printed) and/or electronically are uncontrolled.

The official accreditation reports are maintained in the secured customer files via the ACLASS management information system database accessible only to each respective customer and ACLASS. This is necessary to ensure, where relevant, the confidentiality of documents.

## 21.3 Approval

Any new issuance of documents and changes to any existing documents which have any significant effect upon ACLASS' accreditation process and system shall be formally approved by the Accreditation Council. This approval shall be recorded in meeting minutes or may be accomplished by special balloting.

As a minimum and in addition to the Accreditation Council when dictated, all documents and changes to the Main File issued according to this procedure shall be approved by the Vice President and/or the Senior Accreditation Manager(s). All approvals shall be evidenced by signatures ("/s/" may be used with type printed signature to indicate the actual signature on the approval copy) on the approval page.

# 21.4 Changes

ACLASS reviews its documentation on a recurring basis and will typically make changes to its documentation once a year.<sup>24</sup> Changes occur as a result of activities conducted by ACLASS and/or policies implemented by ACLASS or its Accreditation Council or requirements instituted by ILAC or other interested party. Changes to policy occurring outside of the annual changes will be published as separate documents and made available according to ACLASS requirements. These "outside" policy changes will then be incorporated into the necessary ACLASS document upon publication of the document.

Any suggested change by any interested party shall be through a document change request. ACLASS will evaluate the suggested changes and make any necessary changes to documents as necessary and/or seek approval and/or seek consultation with the Accreditation Council, as necessary. These change requests shall be retained and maintained in an electronic folder. All change requests shall at least be approved by the Vice President and/or the Senior Accreditation Manager(s) before being incorporated into the document. The revision page will indicate the date any and/or all changes have been incorporated into the document. ACLASS, the document name, document number, and revision date shall be listed on each page.

Changes made outside of a document change request and/or conducted during the normal course of business will utilize the "track change" capability within Microsoft Word. This capability will allow for the tracking of changes made to documents. An electronic copy of

<sup>&</sup>lt;sup>24</sup> These changes are typically published during the first quarter of each calendar year. ACLASS reserves the right to make changes to these documents and as circumstances require more or less often as needed.

these draft documents will be maintained for reference purposes only.<sup>25</sup> Draft documents will maintain a distinct file path name such as "DRAFT 1" and will be modified as new drafts are issued.

If the accreditation system or policies are changed, a reasonable transitional period shall be observed. The effective date for the change shall be determined by the Vice President and/or the Senior Accreditation Manager. The above mentioned may discuss the changes and transitional period with the Accreditation Council after conferring with at least some of the customers, as necessary. The Senior Accreditation Manager(s) and/or the Vice President shall formally notify all assessors and customers in writing of the effective date and the action(s) required.<sup>26</sup>

## 21.5 Interpretation of Requirements

Accreditation requirements for accreditation to each respective conformity assessment program are established in the respective accreditation assessment checklists. Any interpretation to these respective requirements may be approved by the Accreditation Council. This approval will be recorded in meeting minutes or may be accomplished by special balloting.

#### 21.6 Publication of Documentation

All ACLASS conformity assessment programs and their associated requirements are made publicly available to ACLASS applicant and accredited customers and may be posted electronically by ACLASS on its website.

The ACLASS management information system database will contain all the current versions of documents, forms, and templates.

### 21.7 Disposal of Records

If ACLASS disposes of records it will do so to ensure confidentiality. Hard copy records will be shredded and discarded according to legal or contractual requirements for retention of records. Electronic records will be deleted from all file locations. ACLASS reserves the right to dispose of records beyond three years so long as ACLASS meets its contractual and legal obligations.

### 21.8 Access to and Back-up of the ACLASS System

ACLASS utilizes several firewalls to protect the integrity and confidentiality of records. These firewalls serve as a means to prevent unauthorized access to the ACLASS system.

<sup>&</sup>lt;sup>24</sup> The document change request form is not required to be used in these instances.

<sup>&</sup>lt;sup>26</sup> Forms are typically modified on a continual basis and will contain the name of the form, form number, and a revision date. Obsolete forms will be maintained for historical purposes

Firewalls, or similar technology as it evolves over time, shall be used to protect and prevent unauthorized access to the ACLASS system.

ACLASS shall use Virtual Private Network technology (or future versions thereof) to provide remote access to the ACLASS system. Use of the VPN is limited to ACLASS staff. The purpose of VPN technology is to allow ACLASS to connect to branch offices or staff working remotely, while maintaining secure communications.

ACLASS shall use tape back-ups and/or servers, or similar technology as it evolves over time, to back-up the ACLASS system. These back-ups shall be used to ensure the entire ACLASS system is able to be restored in case of data loss.

### 21.9 Electronic Documents

ACLASS maintains an electronic system. Documents are created, distributed, viewed, etc. utilizing electronic software (i.e. Microsoft Word, Excel, PowerPoint). ACLASS encourages its customers, assessors and/or experts, and any interested party to submit documents in electronic format.

ACLASS recognizes that electronic documents are not always possible and understands the need for documents to be sent through mail, courier or via facsimile. In instances when customer documents are received in a non-electronic format, ACLASS shall ensure the customers' documents are scanned and stored in the appropriate electronic folder (i.e. customer's folder). The actual document shall then be filed in the traditional manner and stored according ACLASS' legal and/or contractual obligations.

### 22.0 COMPLAINTS AND APPEALS

The purpose of this section is to provide for the fair and equitable handling of external complaints and appeals from any interested party (appellant/complainant). Complaints and appeals brought before ACLASS by customers or other external parties shall be subject to this ACLASS procedure.

## 22.1 Definitions

Appeals: Appeals are normally actions taken by accredited customers or applicant customers to ACLASS and its requirements for accreditation objecting to any adverse decision taken in any step of the process from application for accreditation to the final decision on accreditation.

Complaints: Complaints are an expression of dissatisfaction with any aspect of ACLASS and its operations lodged by anyone in writing or otherwise.

## 22.2 Appellant and Complainant

A party who has an interest in an action, decision, or report is the appellant/complainant. This may include an appeal coming from the customer about the handling of accreditation matters, a complaint from the users of the services provided by the customer, or a complaint from any other external party regarding any other matter. Any negative feedback provided by the customer from the customer survey will be handled according to this document.

The accreditation customer is informed of this procedure in each respective ACLASS document for each respective conformity assessment program and is briefed about this process during the closing meeting in accordance with this document. The appeals and complaints procedure is available to any interested party upon request and may be published electronically.

## 22.3 Appeals Procedure

The ACLASS appeal process has two levels: Level 1 appeals are heard by a panel of ACLASS staff and/or assessors; level 2 by a panel of the Accreditation Council.

Level 1 appeals are heard by a panel of three consisting of staff and/or accreditation assessors not involved in the assessment. This is normally the level applied to any appeal of an assessment nonconformance.

Level 2 appeals are made to the Accreditation Council and heard by a panel of three members of the Council. This is the first level for any appeal of an accreditation decision or any other decision of the Accreditation Council. It is also the second level of appeal if either party (the appellant or ACLASS) is not satisfied with the decision made by the level 1 appeal panel.

An appeal shall be lodged in writing no later than 30 days after notification to the customer of the decision or action, or whenever the appropriate appeal panel may reasonably assume the decision or measure in question to be known to the appellant.

Appeals shall be lodged using the appeals form and will include appropriate substantiation for the appellant's position.

A panel of three members is appointed, with one of the three members appointed chair. For level 1, the panel members are appointed by the ACLASS Vice President and/or Senior Accreditation Manager. For level 2, the panel members are appointed by the chair of the Accreditation Council. The appellant and ACLASS shall be informed of the members of the panel and have an opportunity to object to the selection(s).

Appeals are not legal proceedings. Therefore, ACLASS shall be notified at least 10 days in advance if an appellant intends to have legal counsel present to ensure ACLASS has sufficient advance notice so that it can also have legal counsel present.

The appeal shall be heard within 60 days unless otherwise agreed by all parties.

Unless otherwise agreed in advance, the level 2 appeals hearing shall be conducted as follows:

- Introductions
- Presentation by the appellant, limited to 30 minutes
- Presentation by ACLASS, limited to 30 minutes
- Rebuttals, limited to 10 minutes for each party
- Questions by the panel
- Closing of the hearing. The chair shall:
  - o Make a formal projection regarding the expected time frame for communicating the documented final decision (normally not to exceed two weeks)
  - o Inform all parties that the appeal may be escalated to the next level of appeal within 30 days of receipt of the panel decision
  - o Dismiss the parties

Following the hearing, the panel members will deliberate without any involvement by the appellant or ACLASS.

The chair shall document the panel's decision and send it concurrently to the designated representatives of the appellant and ACLASS.

The appeal panel's decision will be documented. However, any notes made by panel members in preparing for the appeal, during the hearing, or during the subsequent deliberations will not be maintained.

If a level 2 decision by an appeal panel of the Council is unfavorable to the appellant, the appellant may lodge a final appeal in writing to ACLASS. ACLASS shall immediately transmit this letter to the designated responsible ANSI staff for timely consideration and action by the ANSI Appeals Board. The process is described in the ANSI Appeals Board Operating Procedures and can be accessed by visiting www.ansi.org.

ANSI shall communicate the decision of the ANSI Appeals Board to the appellant and ACLASS.

# 22.4 Complaints Procedure

Users of the services provided by the ACLASS customer, or any other external party regarding any other matter may file a complaint. Any complaint shall be directed to the Vice President.

ACLASS requires the complainant, alleging non-conformance of an accredited customer with the accreditation requirements and scope, to first file a complaint directly with the customer in question and allow for the customer's complaint process to be initiated and

completed. If the complainant finds the results of the customer's investigation unacceptable, the complainant may submit a complaint form to ACLASS, and ACLASS shall subsequently carry out an additional investigation.

If a well-reasoned complaint is submitted to ACLASS in writing, the ACLASS Vice President will investigate. ACLASS shall inform the complainant and customer of the results of the investigation.

If the complaint is valid, any cost of the investigation may be charged to the offending customer. If the complaint is determined to be unfounded, the customer shall not be charged for any cost of the investigation.

If the complaint is from a competitor of an ACLASS customer, to prevent the competitor from initiating a complaint inappropriately, ACLASS may require the complainant to agree to pay for the ACLASS investigation in the event that the allegation cannot be substantiated.

Upon submission of a complaint, ACLASS shall:

- Decide the validity of the complaint(s)
- Take any steps necessary to ensure that if the complaint(s) affects an ACLASS
  customer it is addressed first by the customer
- Take any necessary actions and assess their effectiveness
- Record the complaint(s)
- Respond in a timely manner to complaint(s)

The Vice President shall establish a plan of action upon receipt of a valid complaint. This plan of action could include the establishment of a committee, delegation, or any other action deemed necessary to address the complaint. The plan of action will be recorded. If action is necessary to address the complaint, the action and decision will be recorded. The Vice President will inform the complainant and customer in writing (i.e. email, facsimile, or letter) of the action(s) taken and the decision.

ACLASS may require the customer to undergo an on-site visit, in which case ACLASS shall outline the expectations to the customer prior to the visit, which will be the focus of the on-site visit. If the customer does not meet those expectations, ACLASS shall intervene and facilitate the direction of the visit and the assessor(s) may pursue assessment trails of the organization's system. All costs associated with this visit, including review of reports is the responsibility of the customer.

If such a visit is required, the visit will not count as the annual surveillance and/or reassessment visit.

The outcome of the visit will be made known to both the complainant and the customer.

## 22.5 Internal Actions by ACLASS

It may be necessary for ACLASS to take appropriate corrective and preventive action. This would be taken using this document, Section 23. The actions taken and assessment of their effectiveness are recorded using this document, Section 23. This section includes using appropriate investigations to develop remedial and corrective actions, which may include measures for restoring accreditation as quickly as possible, preventing recurrence, and assessing the effectiveness of the measures adopted.

#### 23.0 INTERNAL AUDITS AND REVIEW

The purpose of this section is to establish the requirements for conducting periodic internal audits and reviews of ACLASS throughout its accreditation systems. Also, this section institutes the mechanism to record audits and audit findings and internal corrective actions. The auditor shall inform the Vice President of the outcome.

## 23.1 Responsibility

It is the responsibility of the Senior Accreditation Manager and/or the Vice President to ensure that a competent person (using this document, Section 24, as a guideline) conducts the internal audits and periodic reviews as required by this document.

#### 23.2 Internal Audits

The ACLASS system meets ISO/IEC 17011 as defined in ACLASS' Quality Manual, ACLASS Document 1. Each element of ACLASS' accreditation system shall be audited at least yearly. The Vice President shall determine the date of the internal audit so long as the internal audit is conducted at least yearly. The date of the internal audit will fluctuate depending upon, but not limited to, current business conditions, assessor and staff availability or overall market conditions.<sup>27</sup> Once the date of the internal audit has been determined, the Vice President will notify all relevant personnel.

The ACLASS Internal Audit Checklist or other appropriate checklists shall be used and completed by the auditor to summarize elements audited and results. The checklist is used by the auditor as a record of the element and area audited, and for <u>all</u> note taking. The record should indicate clearly if there were any findings. The checklist should be traceable to each individual finding. This Record becomes part of the internal audit record.

The Internal Finding/Corrective/Preventive Action Record (CPAR), should be used to record any finding and subsequent action. The agreed upon completion date shall be entered on this record. The auditor or person assigned by the Senior Accreditation Manager(s) and/or Vice President is responsible to verify acceptable correction of any finding.

ACLASS shall ensure:

<sup>&</sup>lt;sup>27</sup> The typical timeframe for the internal audit to occur is between May and August

- Internal audits are conducted by appropriate personnel (see 23.2.1)
- Internal audits are conducted by personnel different from those who perform the activity
- Personnel are informed of the outcome of the audit
- Any actions that are taken are done efficiently and effectively
- Opportunities for improvement are identified

### 23.2.1 Internal Auditor

The internal auditor shall be independent of the element or area being audited whenever possible. External auditors may be used to perform internal audits.

Internal auditors shall be:

- Qualified personnel knowledgeable in accreditation
- Knowledgeable in auditing
- Knowledgeable of the requirements of ISO/IEC 17011

#### 23.3 Non-conformances and Internal Corrective Actions

The Internal Finding/Corrective Action Record Form should be used to record any request for internal corrective actions and subsequent action. The Senior Accreditation Manager and/or the Vice President shall assign the person responsible for addressing the request.

### 23.3.1 Identifying Non-conformances

ACLASS may identify non-conformances through several areas. In instances where nonconformities are identified ACLASS will take any necessary corrective action including actions to eliminate the cause and prevent recurrence of the non-conformances according to section 23.3.2.

Identification of non-conformances may arise from, but not limited to:

- Customer and/or third party complaints
- Customer appeals
- Internal audits
- Normal business activities

#### 23.3.2 Internal Corrective Actions

In instances when internal corrective actions are required, the procedure for internal corrective actions will include:

- Identifying non-conformances
- Documenting the request
- Investigation of the cause

- Determination of the action needed to climinate, correct and prevent the cause
- Recording the results
- Application of controls to ensure that the action taken is effective

Any corrective actions taken shall be appropriate to the impact of the problems encountered.

### 23.4 Internal Preventive Actions

ACLASS will identify opportunities for improvement, as necessary, during internal audits and take preventive actions to eliminate possible non-conformances. Additionally, ACLASS will identify opportunities for improvement, as necessary, throughout the normal course of everyday business to eliminate possible non-conformances.

The CPAR Form should be used to record any opportunities for improvement and subsequent action. The Senior Accreditation Manager(s) and/or the Vice President shall assign the person responsible for addressing the request.

The Procedure for internal preventive actions will include:

- Identifying opportunities for improvement
- Documenting the request
- Determination of the action needed to prevent the potential cause of a nonconformance
- Recording the results
- Application of controls to ensure that the action taken is effective

## 23.5 Management Review

A review to ensure the continued effectiveness of the ACLASS accreditation system will be conducted by management at least once a year.

Inputs to management reviews will include, where available and as necessary, performance and improvement opportunities related to:

- Reviewing the nature and content of the accreditation system
- Reviewing assessment requirements and methods
- Reviewing the surveillance and reassessment process
- Reviewing the control and monitoring of the ACLASS symbol
- Reviewing policy matters relating to the operation and effectiveness of the assessor approval process
- Reviewing the implementation of policies
- Reviewing the actions and functions of any appointed committees
- Reviewing the results of internal audits and any internal corrective/preventive actions
- Reviewing any complaints and appeals

- Reviewing any metrics (i.c. objectives) established by the Board of Directors and/or Accreditation Council to measure the effectiveness of the ACLASS Accreditation Process
- Results of peer evaluations
- International activities
- Feedback from interested parties
- New areas of accreditation
- Non-conformance trends, if available
- Any follow-up items from previous management reviews

Outputs from management reviews will include, whenever possible:

- Improvement of ACLASS' management system and processes
- Improvement of ACLASS services and processes with regards to relevant standards and expectations of interested parties
- Possible need for resources
- Establishing or redefining policies, goals and objectives

### 24.0 PERSONNEL AND ASSESSOR CRITERIA AND TRAINING

The purpose of this section is to establish the credentials and training required for the ACLASS Accreditation Council and any committee members, Assessors and Experts. That is, this document ensures that all persons involved with the ACLASS accreditation process are competent for the functions they undertake.

#### 24.1 Accreditation Council and Committee Members

Each member of the Council and any committee established by the Council shall receive indoctrination to the ACLASS accreditation process and requirements from ACLASS management. Further, each member should:

- have a general understanding of the accreditation requirements
- have a general understanding of proficiency testing, traceability and uncertainty requirements, as appropriate
- be competent to represent the programs operated by ACLASS
- be actively involved with the calibration, test, inspection, PT provider or RMP type(s) represented (when relevant)
- possess the ability to make judgments about the accreditation system
- possess the ability to make judgments about the assessor approval system

### 24.2 Assessors

This section establishes the assessor and expert requirements.

# 24.2.1 Assessor Minimum Requirements

Assessors shall meet the ACLASS Minimum Requirements ("Minimum Requirements") for qualification as an ACLASS Assessor. ISO 19011:2002 and ILAC G11:2006 (and any future versions thereof) are used as guidance for the qualification of assessors, lead assessors and experts.

Education: Candidates shall have completed at least secondary education and clearly and fluently express concepts and ideas orally and in writing in English.<sup>28</sup>

Training: Candidates shall have undergone training to ensure competence. The training shall be relevant in the following areas:

- Knowledge and understanding of the applicable standards
- Assessment techniques of examining, questioning, evaluating and reporting
- Measurement uncertainty/traceability, as appropriate
- Proficiency testing/inter-laboratory comparisons, as appropriate
- Additional skills required for managing an assessment i.e. planning, organizing, communicating and directing

Such Competence shall be demonstrated through written and/or oral examinations.<sup>29</sup>

Work Experience: Candidates shall have the equivalent of a minimum of 4 years full time practical workplace experience.<sup>30</sup> In some cases, extensive experience in the relevant fields of expertise may be substituted for formal qualification.

Assessment Experience<sup>31</sup>: Candidates shall have gained experience by participating in a minimum of 3 assessments, which include documentation review, actual assessment activities and assessment reporting ("Complete Assessment"). Evidence of Complete Assessment can be shown on an assessment log maintained by each individual assessor.<sup>32</sup>

A Candidate may meet this requirement, if having no previous conformity assessment experience, but can demonstrate other assessment experience by observing at least 2 assessments using applicable requirements for each ACLASS conformity assessment program or equivalent criteria accompanied by a Lead Assessor and participating in at least 1

<sup>&</sup>lt;sup>28</sup> Appropriate workplace experience may be substituted in lieu of education, as determined by the Senior Accreditation Manager(s). Appropriate objective evidence shall be supplied by the Candidate.
<sup>29</sup> Evidence of training is typically shown by completion of a training certificate pursuant to a training course

<sup>&</sup>lt;sup>29</sup> Evidence of training is typically shown by completion of a training certificate pursuant to a training course from a credible training course provider as determined by the Corporate Accreditation Manager and/or the Vice President. Evidence of training can also be demonstrated, as described below under Section 24.3.

<sup>&</sup>lt;sup>36</sup> Post-secondary education (i.e. Masters and/or Doctorates) may be substituted in lieu of workplace experience, as determined by ACLASS. Appropriate objective evidence shall be provided by the Candidate.

Assessor Candidates who do not meet the assessment experience requirements shall be considered either Technical Experts or Team Assessors. While gaining experience, such experts and Assessors can only participate on assessment teams under the direction of an approved ACLASS Lead Assessor.

<sup>&</sup>lt;sup>32</sup> Assessors approved by APLAC, IAAC or ILAC recognized Accreditation Bodies shall typically meet ACLASS requirements. Appropriate objective evidence shall be provided by the Candidate.

assessment as a member of an assessment team, as determined by ACLASS.<sup>33</sup> Evidence of observation shall be documented.

Personal Attributes and Management Capabilities: ACLASS utilizes ISO 19011:2002 (and any future versions thereof) as a guide for assessor attributes.

Assessors: All ACLASS Assessors shall meet the Minimum Requirements, and:

- be generally familiar with assessment practices
- be capable of verifying the suitability of the customer's management system to the established requirements
- have the ability to communicate effectively, in writing and orally and in writing in English
- be proficient in the respective ACLASS accreditation process
- be approved by the Senior Accreditation Manager(s) for the appropriate competencies
- be familiar with the relevant legal regulations, accreditation procedures and accreditation requirements
- have thorough knowledge of this document and each applicable ACLASS conformity assessment program
- have appropriate technical knowledge for the specific ACLASS conformity assessment program. This may be an assessor or expert.
- have a degree of understanding sufficient to make a reliable assessment of the competence of the applicant entity to operate within its scope
- not have any conflict of interest with that customer, nor consult to that customer. All personnel will be impartial in performing their duties
- not assess a customer that the assessor has worked for or provided any type of consulting services or advice within the last twenty-four months. This restriction will continue for an additional twelve months after the last assessment activity performed by the assessor

Lead Assessor: All ACLASS Lead Assessors shall be a qualified Assessor in at least three complete assessments using the applicable accreditation standards or equivalent criteria in the capacity of an Assessor.<sup>14</sup>

Candidates shall have adequate experience in a technical field (see Section 24.4 below). This experience shall also include quality management, quality assurance or management system auditing related to conformity assessment activities.

Lead Assessors shall also be able to:

- Assist in the selection of team members
- Prepare assessment plans
- Lead an assessment team

<sup>&</sup>lt;sup>33</sup> Appropriate objective evidence shall be provided by the Candidate to demonstrate Assessment Experience.

Assessors from APLAC, IAAC or ILAC recognized Accreditation Bodies may typically qualify as a Lead Assessor. Appropriate objective evidence shall be provided by the Candidate.

- Make decisions relating to the assessment
- Represent ACLASS with the organization's management
- Draft, coordinate, and submit assessment reports according to ACLASS requirements

The Senior Accreditation Manager(s) and/or the Vice President may withdraw approval of any assessor at any time.

### 24.3 Assessor Training

Any assessor desiring to become an ACLASS assessor will be required to provide documented evidence of the following and as appropriate:

- Quality Auditing / Assessment experience
- Appropriate Training/Experience for each respective ACLASS conformity assessment program<sup>35</sup>
- Uncertainty Training/Experience, as applicable
- Proficiency Testing Training/Experience, as applicable

This experience shall be reviewed by ACLASS and documented. Supporting documented evidence will become part of the Assessor's record, which will be maintained by ACLASS. For those Assessors lacking the necessary minimum training requirements, ACLASS may assist in providing the required training, with any resulting training fees to be paid by the Assessor.

For those assessors lacking evidence of successful completion of an appropriate Lead Assessor course, they shall be required to participate and successfully complete ACLASS' lead assessor course.<sup>36</sup>

All new ACLASS Assessors (whether staff or contract) shall be provided with the following ACLASS documents prior to their initial ACLASS training on policies and procedures:

- Quality Manual (ACLASS Document 1)
- ACLASS Document 2
- Appropriate ACLASS conformity assessment program documents
- ACLASS Guidance Documents

Each new Assessor will be instructed to read and prepare any questions for the initial ACLASS training on policies and procedures.

Training may be conducted in a formal classroom setting or one-on-one as the situation dictates. The purpose of this training is to familiarize the Assessor with the ACLASS accreditation system and will cover such topics as:

<sup>35</sup> E.g. ISO/IEC 17025, ISO/IEC 17020, RMP (ISO Guide 34)

<sup>&</sup>lt;sup>36</sup> ACLASS' lead assessor course is typically offered twice a year.

- ACLASS accreditation system requirements
- Report types and composition
- Checklist requirements
- Scope of accreditation review/validation
- Uncertainty calculation review/validation
- Proficiency testing review/validation
- Nonconformity types and documentation
- Any other topics as deemed necessary

ACLASS accreditation system training shall be documented on the Assessor Approval Checklist.

Changes to the ACLASS accreditation system/associated documents of importance to Assessors in performance of their assessments shall be disseminated upon approval.

The ACLASS management information system database shall contain all the current versions of documents, forms and templates.

Follow-up training of ACLASS assessors will be conducted on an "as needed" basis (but at least biennially), as determined by the ACLASS Senior Accreditation Manager(s) and/or the Vice President. Follow-up training may consist of:

- Significant changes in ACLASS accreditation system requirements
- Updates to ISO standard guidelines
- Refresher training on uncertainty, proficiency testing, etc.
- Any other topics as deemed necessary

## 24.4 Assessor/Expert Technical Competence Approval

The Accreditation Council, the Senior Accreditation Manager(s) and/or the Vice President have the authority to approve and appoint all assessor(s) and expert(s). Each assessment team shall have at least one member who has been approved for the customer's related operations. Specific technical knowledge may be required as recognized during assessment planning.

Assessor approval for a related operation shall be to recognize technical competence. It shall be comprised of a combination of at least two of the following three: education and training, work experience, and assessment experience. The total of all three categories must total one year (as a minimum). The Accreditation Council, the Senior Accreditation Manager(s) and/or the Vice President have final authority to approve an assessor and/or expert to a related operation.

### 24.4.1 Assessor/Expert Approval Process

The Accreditation Council will review and approve the assessor and/or expert approval process during its meetings. The Senior Accreditation Manager(s) will review assessor

and/or expert candidates and determine whether the potential assessor(s) and/or expert(s) records meet the ACLASS requirements.

To the extent that ACLASS management desires, ACLASS management may submit assessor and/or expert candidates to the Accreditation Council for review and consideration, if necessary. In such instances, the Accreditation Council will take into consideration the Senior Accreditation Manager(s) review and decision as well as all records submitted for review. The Accreditation Council may request additional information.

The outline and record for approval shall be performed using ACLASS Assessor/Expert Approval Checklist.

The Accreditation Council, the Senior Accreditation Manager(s) and/or the Vice President may withdraw approval of any assessor and/or expert at any time.

Additional specific technical training and approval may be required by the Accreditation Council, the Senjor Accreditation Manager(s) and/or the Vice President.

Training of assessors and experts as well as assessments shall be conducted according to this document and applicable ACLASS conformity assessment program documentation.

### 24.5 Witnessing of Assessors

An Assessor may be required by the Senior Accreditation Manager(s) and/or the Vice President to be witnessed initially (i.e. on their first assignment). ACLASS Assessor Witness Form shall be used to record initial Assessor witnessing. Assessors shall be witnessed by a qualified ACLASS Assessor, Program Manager(s) or the Senior Accreditation Manager(s), as necessary.

Assessors shall normally be witnessed at least once every two years. ACLASS Assessor Witness Form shall be used to record ongoing Assessor witnessing. Assessors shall be witnessed by the Senior Accreditation Manager(s) (or their designees).

A schedule shall be maintained by ACLASS regarding ongoing witnessing of assessors.

## 24.6 Experts

Experts shall meet the technical criteria as required of an Assessor for the appropriate technical related operations. An expert is considered an individual who provides technical advice with an appreciation for each respective standard but is not considered an assessor unless they have the relevant assessor qualifications.

<sup>&</sup>lt;sup>37</sup> Assessors approved by an APLAC, IAAC or ILAC recognized Accreditation Body may not typically require initial witnessing.

<sup>&</sup>lt;sup>38</sup> Those assessors that have performed five assessments or less within a two year period will be witnessed on a three year cycle.

The primary purpose of an expert is to provide technical expertise to ACLASS.

Assessments utilizing an Expert shall be accompanied and witnessed by the Lead Assessor and/or the Senior Accreditation Manager(s) or Program Manager(s) using ACLASS Assessor Witness Form. Experts are responsible to assist the Lead Assessor however reasonably requested. ILAC Guide 11 and ISO 19011 are used as guidelines for the qualification and evaluation of Experts.

# 24.7 Written Agreement

An agreement covering the relationship between ACLASS and each individual who may participate in assessments including confidentiality and conflict of interest shall exist.

For ACLASS staff Assessors, their ACLASS employment contract/agreement will satisfy this requirement. ACLASS contract Assessors and Experts will be required to sign an Assessor and Expert Agreement.

In addition, all ACLASS Assessors and Experts are required to complete a Confidential Information and No Conflict of Interest Agreement for each ACLASS customer for whom they perform accreditation activities.

## 24.8 Continuing Approval

Each individual shall maintain credentials according to the rules of the national approval scheme that has approved him or her. Each Assessor shall keep ACLASS informed of changes and additions to his or her credentials.

The Senior Accreditation Manager(s) and/or the Vice President shall consider feedback received from the Assessment Activity Survey when continuing approval of an Assessor.

#### 24.9 Records

Information on the relevant qualifications, training and experience of each person involved with the ACLASS accreditation process shall be maintained and kept up-to-date.

ACLASS shall maintain a record of the credentials of each member of the Accreditation Council. These records shall include education, experience, and knowledge of ISO standards.

ACLASS shall maintain a record of the credentials of each Lead Assessor, Assessor and/or Expert. This record should include name/address, organization affiliation/position held, assessor agreement, ISO credentials/training, educational qualification/professional status, job/work experience, accreditation assessment experience (with fields of competence), industry sector experience (to include training in quality assurance and technical areas), assessor witness records, and date of most recent updating of record.

#### 24.10 Accreditation Decision

ACLASS requires that the accreditation decision be separate from the accreditation assessment. In instances when the Senior Accreditation Manager(s) and/or Program Manager(s) participate in the accreditation assessment a "designee" must be appointed to make the final recommendation to the Senior Accreditation Manager and/ or Vice President (see also Section 10.1). A "designee" is:

- familiar with the relevant legal regulations, accreditation procedures and accreditation requirements
- a trained assessor
- appointed by the Senior Accreditation Manager(s) and/or Vice President
- familiar and knowledgeable of this document and the appropriate ACLASS conformity assessment programs
- able to communicate in writing and orally effectively
- have a degree of understanding sufficient to make a reliable assessment of the competence of the applicant entity to operate within its scope
- not have any conflict of interest with that customer, nor have given any advice to that customer or participated in the assessment
- able to maintain impartiality and integrity

## 24.11 Initial Training

Initial training for assessors and/or experts is defined above within this document section 24.

Initial staff training shall comprise, at a minimum, ACLASS policies and procedures. Additional initial staff training is determined on an as needed basis. Evidence of initial staff training shall be documented and become part of their record.

## 24.12 Ongoing Training

ACLASS encourages its staff, assessors and experts to continually participate in training and education to further advance their knowledge. At times, it is necessary to hold training forums to ensure its staff, assessors and experts are kept apprised of policies, procedures and changes within the industry. ACLASS will hold training forums which may include, but are not limited to the following:

- ACLASS Policies and Procedures
- Measurement Uncertainty & Traceability
- Proficiency Testing/Inter-Laboratory Comparisons
- Industry Trends
- Calibration/Testing/RMP/Inspection/PT provider Issues

- Regional Co-operations
- Extension into New Fields of Accreditation

At times, ACLASS is made aware of training sessions, workshops, seminars, etc., sponsored by third parties not affiliated with ACLASS. ACLASS encourages its staff, assessors, and experts to attend these sessions, workshops, seminars, etc., to further their knowledge.

Certificates issued as a result of any training session, either by ACLASS or third parties will become part of ACLASS staff, assessors, or experts' records. It is the responsibility of each individual to provide a copy of any certificates issued to ACLASS.

### 25.0 ACCREDITATION COUNCIL

The purpose of this section is to establish ACLASS / ANSI-ASQ National Accreditation Board's, Accreditation Council and its authority over the ACLASS accreditation system (hereinafter referred to as "the Council"). The Council receives its authority directly from the Board of Directors. The Council is not motivated by profit nor are they tied to compensation. This document also describes the general functions, operating requirements and policies of the Council.

The purpose of the Council is to:

- Ensure the integrity and impartiality of the ACLASS accreditation process
- Formulate and supervise the implementation of policy for operation of ACLASS
- delegate authority to committees or individuals to undertake defined technical activities
- Oversee the accreditation system, process and integrity
- Oversee the assessor and accreditation review panel approval system
- Represent the appropriate technical competencies and provide specific technical input for accreditation requirements

### 25.1 Requirements and Policies

The Council has the responsibility to provide advice on policies, goals and requirements for protecting the integrity of the ACLASS accreditation process.

The Council has the right and authority to establish all policies, goals and requirements for protecting and carrying out the ACLASS accreditation process defined in the Quality Manual, ACLASS Document 1.

The Council has the right and authority to review assessors and/or experts. Additionally, the Council has the right and authority to review members of the Accreditation Review Panel.

#### 25.2 Members

The responsibility and authority of the Council is by delegation from the ANSI-ASQ National Accreditation Board's Board of Directors (BOD). The Chair is responsible for keeping the BOD fully apprised of the Council's activities; this responsibility may be delegated to ACLASS staff. The members are recommended and/or nominated by the CEO/President and/or Vice President, current members of the Accreditation Council, or any other interested party.

The Accreditation Council approves its own members and/or nominees. If the members and/or nominees are not accepted by the Accreditation Council, specific reasons must be stated.

The members of the Council will be chosen from and represent those interests involved in the accreditation process without any single interest predominating. Members shall be selected to provide a balance of experience among the types of programs offered by ACLASS and the interests of stakeholders in the programs, when possible.

Members shall be capable of working well together as an independent team, exercising good judgment, communicating effectively, and supporting the decisions of the Council.

#### 25.3 Structure and Status

The Council has the authority and the independence needed to carry out its responsibility impartially, and may establish its own rules and mode of operation within the general eanon of this document, including establishing any technical committees for specific interpretation of the accreditation requirements.

A list of members of the Council shall be maintained by ACLASS to document stakeholder representation.

ACLASS' Vice President and Senior Accreditation Manager(s) shall be designated ex officio members.

A quorum of the Council members will be a simple majority of its members. The Council will make all determinations by a vote of the simple majority of the members present at a meeting at which a quorum is present or by written consent executed by a simple majority of the members. Each member has one vote. Only members of the Council have the right to vote. Members will abstain if any conflict exists.

Members are appointed by the Council to three-year terms. A member may serve no more than three consecutive terms in a given role on the Council.

The Senior Accreditation Manager(s) will make and maintain records of all meetings and actions of the Council.

## 25.3.1 Chair Appointment and Responsibilities

The Council shall have a Chair and Vice Chair from among its members. The Chair would be the focal point of all Council activities.

The Chair is responsible for ensuring:

- Agendas are established and meetings are held
- Council members meet attendance requirements
- Necessary committees are formed in a timely manner
- Implementation of this procedure

The Vice Chair shall function as the Chair in the absence of the Chair.

#### 25.3.2 Council Decisions

ACLASS will act appropriately on the decisions of the Council. The Vice President will inform the Council if appropriate action is not taken.

Decisions are made by the Council following discussion among knowledgeable experts. A vote shall be taken, provided a quorum is present, with a simple majority ruling.

Balloting by mail, fax, or electronic means is permissible under rules established by the Council. Decisions may be made by electronic voting that allows all members to view the votes and comments of other members and to change their vote if they are swayed by the comments of other members. Except as otherwise specified in this procedure, decisions by electronic ballot require a simple majority of all voting members of the Council.

## 25.4 Impartiality, Confidentiality and Conflict of Interest

The Council will establish policy, requirements and structure to safeguard impartiality and enable participation from all interested parties in a way that is free from control by those who have direct commercial, financial or other interest in the services concerned with any customer seeking accreditation by ACLASS. The Council is not motivated by profit nor tied to compensation.

All members of the Council will agree in writing to hold all information about ACLASS and its customers in strict confidence, and not to participate in any decision and vote for which the member has any conflict of interest.

The Council has no authority, and will not make any decision nor give any advice specifically regarding any ACLASS customers' accreditation.